

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

ALLSTATE INSURANCE COMPANY;
ALLSTATE FIRE AND CASUALTY
INSURANCE COMPANY; ALLSTATE
PROPERTY AND CASUALTY
INSURANCE COMPANY; ESURANCE
INSURANCE COMPANY; and
ESURANCE PROPERTY AND
CASUALTY INSURANCE COMPANY,

Plaintiffs,

v.

MICHIGAN PAIN MANAGEMENT
PLLC; DEARBORN PAIN
SPECIALISTS, PLC; SOUTHFIELD
PAIN MANAGEMENT, PLLC;
STERLING HEIGHTS PAIN
MANAGEMENT, PLC; PRECISION
MRI OF MICHIGAN LLC d/b/a
PRECISE MRI; ADVANCED
SURGERY CENTER, LLC; NORTH
SHORE INJURY CENTER, INC.;
MEDI TRANSIT INC.; JAMES
PADULA, D.O.; JONATHAN MAFFIA;
WILLIAM GONTE, M.D.; ELIAS
GOLDSTEIN, D.C.; ALBERT
JEROME, D.C.; FRANCES MADDEN,
M.D.; FATINA MASRI, M.D.;
HAITHAM MASRI, M.D.; ALI FARAJ;
JAMES DEWEESE; and NATHAN
KARRUMI, D.C.,

Defendants.

C.A. No. _____

CERTIFICATE OF NO LIABILITY INSURANCE

I, Jacquelyn A. McEttrick, counsel for the plaintiffs in the above-captioned matter, hereby certify that:

- (1) The plaintiffs are not aware of any liability insurance available to satisfy the judgment sought in this matter.
- (2) Neither I nor the plaintiffs have any reason to believe that there will be any liability insurance available to satisfy the judgment sought in this matter as the Complaint alleges intentional acts against the above-identified defendants.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

SMITH & BRINK

/s/ Jacquelyn A. McEttrick

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Dated: February 26, 2019